1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 CHRISTOPHER BROWN, et al., 10 No. 2:22-cv-00965-JHC Plaintiffs, 11 STIPULATED MOTION AND ORDER TO FILE FIRST AMENDED v. 12 COMPLAINT AND EXTEND AMAZON.COM, INC., a Delaware corporation, AMAZON'S DEADLINE TO RESPOND 13 Defendant. 14 15 16 Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure and Local Civil Rule 17 15, the parties and their respective counsel stipulate as follows: 18 Rule 15(a)(2) of the Federal Rules of Civil Procedure permits Plaintiffs to amend 1. 19 their complaint with the consent of the Defendant. The parties have met and conferred, and 20 Defendant has consented to Plaintiffs filing their First Amended Complaint ("FAC"). 21 2. The FAC is timely, as the Court has not set a deadline for amending pleadings. 22 3. Pursuant to Local Rule 15, a clean copy of the FAC is attached hereto as Exhibit 23 A and a redline copy of the FAC is attached hereto as Exhibit B. 24 4. The Parties stipulate and agree that Defendant shall have up to 90 days to answer 25 or 30 days to move or otherwise respond to Plaintiffs' FAC. 26 27 STIPULATED MOTION AND ORDER TO AMEND COMPLAINT 28 AND EXTEND DEADLINE TO RESPOND - 1 Case No. 2:22-cv-00965-JHC

1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the 2 Parties, through their undersigned counsel of record, and the Parties ask the Court to order that: Plaintiffs file their FAC, substantially in the form of Exhibit A, no later than ten (10) days 3 4 from the date the order is entered. Amazon shall file its answer within ninety days of Plaintiffs 5 filing their FAC. To the extent Amazon moves to dismiss the FAC: (i) Amazon shall move to 6 dismiss within thirty days of Plaintiffs filing their FAC; (ii) Plaintiffs will have twenty-one days 7 to file their response to Amazon's motion to dismiss; and (iii) Amazon will have eleven days to 8 file its reply in support of its motion to dismiss. 9 DATED: September 26, 2024 Respectfully submitted, 10 HAGENS BERMAN SOBOL SHAPIRO LLP 11 By: /s/ Steve W. Berman 12 Steve W. Berman (WSBA No. 12536) 13 By: /s/ Barbara A. Mahoney Barbara A. Mahoney (WSBA No. 31845) 14 1301 Second Avenue, Suite 2000 Seattle, WA 98101 15 Telephone: (206) 623-7292 Facsimile: (206) 623-0594 16 E-mail: steve@hbsslaw.com 17 barbaram@hbsslaw.com 18 Anne F. Johnson (pro hac vice) 594 Dean Street, Suite 24 19 Brooklyn, NY 11238 Telephone: (718) 916-3520 20 E-mail:annej@hbsslaw.com 21 KELLER POSTMAN LLC 22 Zina G. Bash (pro hac vice) 23 111 Congress Avenue, Suite 500 Austin, TX 78701 24 Telephone: (512) 690-0990 25 E-mail: zina.bash@kellerpostman.com 26 27 STIPULATED MOTION AND ORDER TO AMEND COMPLAINT 28

STIPULATED MOTION AND ORDER TO AMEND COMPLAINT AND EXTEND DEADLINE TO RESPOND - 2 Case No. 2:22-cv-00965-JHC

1	
2	Jessica Beringer (pro hac vice) Shane Kelly (pro hac vice)
3	150 N. Riverside Plaza, Suite 4100
	Chicago, IL 60606
4	Telephone: (312) 741-5220
5	E-mail: jessica.beringer@kellerpostman.com shane.kelly@kellerpostman.com
6	Roseann Romano (pro hac vice)
7	1101 Connecticut Avenue, N.W., Suite 1100 Washington, DC 20036
8	Telephone: (202) 983-5484
9	E-mail: roseann.romano@kellerpostman.com
9	QUINN EMANUEL URQUHART &
10	SULLIVAN, LLP
11	
	By: /s/ Alicia Cobb
12	Alicia Cobb, WSBA # 48685 1109 First Avenue, Suite 210
13	Seattle, WA 98101
	Telephone: (206) 905-7000
14	E-mail: aliciacobb@quinnemanuel.com
15	
1.6	Steig Olson (pro hac vice)
16	Maxwell P. Deabler-Meadows (pro hac vice) Nicolas Siebert (pro hac vice)
17	David Du LeRay (pro hac vice)
	Aaron Lawrence (pro hac vice)
18	51 Madison Avenue, 22nd Floor
19	New York, NY 10010
19	Telephone: (212) 849-7000
20	E-mail: steigolson@quinnemanuel.com
21	davidleray@quinnemanuel.com
21	nicolassiebert@quinnemanuel.com
22	maxmeadows@quinnemanuel.com aaronlawrence@quinnemanuel.com
23	aaromawrenee@qummemanuer.com
23	Adam B. Wolfson (pro hac vice)
24	865 South Figueroa Street, 10th Floor
ا ء	Los Angeles, CA 90017-2543
25	Telephone: (213) 443-3000
26	E-mail: adamwolfson@quinnemanuel.com
27	Attorneys for Plaintiffs
28	STIPULATED MOTION AND ORDER TO AMEND COMPLAINT AND EXTEND DEADLINE TO RESPOND - 3

Case No. 2:22-cv-00965-JHC

1	DAVIS WRIGHT TREMAINE LLP
2	
3	By: /s/ John A. Goldmark John A. Goldmark, WSBA #40980
4	MaryAnn Almeida, WSBA #49086 920 Fifth Avenue, Suite 3300
5	Seattle, WA 98104-1610
6	Telephone: (206) 622-3150 Email: JohnGoldmark@dwt.com
7	Email: MaryAnnAlmeida@dwt.com PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
8	
9	Karen L. Dunn (<i>pro hac vice</i>) William A. Isaacson (<i>pro hac vice</i>)
10	Amy J. Mauser (pro hac vice)
11	Martha L. Goodman (<i>pro hac vice</i>) Kyle Smith (<i>pro hac vice</i>)
12	2001 K Street, NW Washington, D.C. 20006-1047
13	Telephone: (202) 223-7300
14	Email: kdunn@paulweiss.com Email: wisaacson@paulweiss.com
15	Email: amauser@paulweiss.com Email: mgoodman@paulweiss.com
16	Email: ksmith@paulweiss.com
17	Attorneys for Defendant Amazon.com, Inc.
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	STIPULATED MOTION AND ORDER TO AMEND COMPLAINT AND EXTEND DEADLINE TO RESPOND - 4

Case No. 2:22-cv-00965-JHC

ORDER

The Court **GRANTS** the Parties' stipulated motion. Within ten (10) days of this order, Plaintiffs may file their First Amended Complaint (substantively in the form of Exhibit A at Dkt. # 98-1). Amazon shall file its answer to Plaintiffs' First Amended Complaint within ninety days. In the alternative, if Amazon moves to dismiss the First Amended Complaint: (i) Amazon shall move to dismiss within thirty days of Plaintiffs filing their First Amended Complaint; (ii) Plaintiffs will have twenty-one days to file their response to Amazon's motion to dismiss; and (iii) Amazon will have eleven days to file its reply in support of its motion to dismiss.

Dated: September 26, 2024.

John H. Chun

United States District Judge